



June 8, 2023

VIA ECF

The Honorable Denise L. Cote
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Hyper Bicycles, Inc. v. Acctel, 22-cv-1601; Acctel v. Hyper Bicycles, 22-cv-3308

Dear Judge Cote,

On behalf of Acctel Ltd. ("Acctel") and Hyper Bicycles Inc. ("Hyper"), we submit this joint letter regarding certain drafts of the Settlement Agreement containing Acctel's bank account number that have been inadvertently filed publicly on the docket by both parties without the necessary redaction. To comply with Federal Rule of Civil Procedure 5.2, the parties should have redacted all but the last four digits of the account number. We have contacted the clerk's office about this issue and were instructed to file a motion with the Court requesting permission to seal these documents. We therefore move to seal copies of the Settlement Agreement, which appear at the following ECF numbers: 16-1, 28-3, 29-3, 32-1, 79-17, 80-9, and 99-23 in Case No. 22-cv-3308, and ECF numbers 23-3 and 26-1 in case number 22-cv-3308.

Should the Court grant this motion, we will file a redacted copy of the Settlement Agreement (attached hereto as Ex. A) and will link it to the filings above.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Fern Mechlowitz

Fern Mechlowitz
Counsel for Acctel

/s/ Renee Zaytsev

Renee Zaytsev
Counsel for Hyper

*Granted -
Denise Cote
6/8/23*